

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COLBY GOROG, JOSHUA FLINT, LOUIS
ROBINSON, and MICHAEL LERRO,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

ELON MUSK and TESLA, INC.,

Civil Action No.: 1:22-cv-05037-AKH

Defendants.

**DECLARATION OF ALEX SPIRO IN SUPPORT OF DEFENDANTS'
MOTION FOR RULE 11 SANCTIONS**

I, Alex Spiro, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of this Court and of the firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Defendants Elon Musk and Tesla, Inc. in the above-captioned action.
2. I respectfully submit this declaration in support of Defendants' Motion For Rule 11 Sanctions.
3. Annexed hereto as **Exhibit 1** is a true and correct copy of an article published by the Block written by Jim Edwards entitled *Twitter Will Be Added To Dogecoin Ponzi Scheme Litigation If Elon Musk Cannot Get Case Dismissed* and dated April 12, 2023.
4. Annexed hereto as **Exhibit 2** is a true and correct copy of email correspondence from Evan Spencer to Sarah Heaton Concannon dated May 23, 2023.
5. Annexed hereto as **Exhibit 3** is a true and correct copy of email correspondence from Evan Spencer to Sarah Heaton Concannon dated May 24, 2023.

6. Annexed hereto as **Exhibit 4** is a true and correct copy of a letter sent from Alex Spiro to Evan Spencer on June 12, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 14, 2023 in New York, New York.

/s/ Alex Spiro

Alex Spiro